### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In Re: AUTOMOTIVE PARTS ANTITRUST

LITIGATION

Master File No. 12-md-02311 Honorable Marianne O. Battani

In re: Wire Harness Cases In re: All Auto Parts Cases

THIS DOCUMENT RELATES TO:

All Wire Harness Cases All Auto Parts Cases 2:12-cv-00100-MOB-MKM 2:12-md-02311-MOB-MKM

# NOTICE OF OBJECTIONS TO END PAYOR PLAINTIFF AND AUTO DEALER PLAINTIFF DEPOSITION PROTOCOL ORDER

The wire harness defendants<sup>1</sup> hereby give notice that they object to Paragraphs III.B, III.D.3, and IV.B of the End Payor Plaintiff and Auto Dealer Plaintiff Deposition Protocol Order (MDL ECF No. 1021), for the reasons stated in Wire Harness Defendants' Objections to, and Motion to Modify, Master Esshaki's June 18, 2015 Order ("June 18 Order"), filed in the above cases on June 19, 2015 (MDL ECF No. 1010) ("Motion to Modify") and the corresponding Reply brief (MDL ECF No. 1025), filed in the above cases on July 6, 2015. *See* Motion to

<sup>&</sup>lt;sup>1</sup> "Wire harness defendants" refers to Chiyoda Manufacturing Corporation; Chiyoda USA Corporation; American Furukawa, Inc.; Furukawa Electric Co., Ltd.; DENSO Corporation; DENSO International America, Inc.; Fujikura Automotive America LLC; Fujikura Ltd.; G.S. Electech, Inc.; G.S.W. Manufacturing, Inc.; G.S. Wiring Systems, Inc.; Leoni Wiring Systems, Inc.; Leonische Holding Inc.; Mitsubishi Electric Corporation; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electric Automotive America, Inc.; Sumitomo Electric Industries, Ltd.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc.; Sumitomo Wiring Systems (U.S.A.) Inc.; Tokai Rika Co., Ltd.; and TRAM, Inc.

Modify at ¶¶ 6-7. A hearing has been set for September 9, 2015 to resolve the wire harness defendants' motion. *See* Scheduling Order on Objection to And Motions to Modify Master Esshaki's June 19, 2015 Order (MDL ECF. No. 1022).

Date: July 17, 2015 LATHAM & WATKINS LLP

By: /s/Marguerite M. Sullivan
Marguerite M. Sullivan
LATHAM & WATKINS LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200
Fax: (202) 637-2201
Marguerite.Sullivan@lw.com

Daniel M. Wall LATHAM & WATKINS LLP 505 Montgomery Street, Suite 2000 San Francisco, CA 94111 Telephone: (415) 395-0600 Fax: (415) 395-8095 dan.wall@lw.com

David D. Cross CROWELL & MORING LLP 1001 Pennsylvania Avenue, N.W. Washington, D.C. 20004 Tel: 202-624-2500 Fax: 202-628-5116 dcross@crowell.com

William H. Horton (P31567) GIARMARCO, MULLINS & HORTON, P.C. 101 West Big Beaver Road, Tenth Floor Troy, MI 48084-5280 Telephone: 248-457-7060 bhorton@gmhlaw.com

Attorneys for Defendants Sumitomo Electric Industries, Ltd.; Sumitomo Wiring Systems, Ltd.; Sumitomo Electric Wiring Systems, Inc.; and Sumitomo Wiring Systems (U.S.A.) Inc.

#### LANE POWELL PC

By: /s/Larry S. Gangnes (w/consent)
Larry S. Gangnes
LANE POWELL PC

U.S. Bank Centre 1420 Fifth Ave., Suite 4200 P.O. Box 91302 Seattle, WA 98111-9402 Telephone: (206) 223-7000 Facsimile: (206) 223-7107 gangnesl@lanepowell.com

Craig D. Bachman Kenneth R. Davis II Darin M. Sands Peter D. Hawkes Masayuki Yamaguchi LANÉ POWELL PC MODA Tower 601 SW Second Ave., Suite 2100 Portland, OR 97204-3158 Telephone: (503) 778-2100 Facsimile: (503) 778-2200 bachmanc@lanepowell.com davisk@lanepowell.com sandsd@lanepowell.com hawkesp@lanepowell.com yamaguchim@lanepowell.com

Richard D. Bisio (P30246) Ronald S. Nixon (P57117) KEMP KLEIN LAW FIRM 201 W. Big Beaver, Suite 600 Troy, MI 48084 Telephone: (248) 528-1111 Facsimile: (248) 528-5129 richard.bisio@kkue.com ron.nixon@kkue.com

Attorneys for Defendants Furukawa Electric Co., Ltd.; and American Furukawa, Inc.

# WILMER CUTLER PICKERING HALE AND DORR LLP

### By: /s/Steven F. Cherry (w/consent)

Steven F. Cherry
Patrick J. Carome
David P. Donovan
Brian C. Smith
Kurt G. Kastorf

WILMER CUTLER PICKERING HALE AND

DORR LLP

1875 Pennsylvania Avenue, N.W.

Washington, D.C. 20006 Telephone: (202) 663-6000

Fax: (202) 663-6363

steven.cherry@wilmerhale.com

patrick.carome@wilmerhale.com david.donovan@wilmerhale.com brian.smith@wilmerhale.com kurt.kastorf@wilmerhale.com

Attorneys for Defendants DENSO International America, Inc. and DENSO Corporation

Steven M. Zarowny (P33362) General Counsel DENSO International America, Inc. 24777 Denso Drive Southfield, MI 48033 Telephone: (248) 372-8252 Fax: (248) 213-2551 steve\_zarowny@denso-diam.com

Attorney for Defendant DENSO International America, Inc.

### ARNOLD & PORTER LLP

By: /s/James L. Cooper (w/consent)

James L. Cooper
Michael A. Rubin
Laura Cofer Taylor
Katherine Clemons
ARNOLD & PORTER LLP
555 Twelfth Street NW
Washington, DC 20004
(202) 942-5000
(202) 942-5999 (facsimile)
james.cooper@aporter.com
michael.rubin@aporter.com
laura.taylor@aporter.com
katherine.clemons@aporter.com

Joanne Geha Swanson (P33594)
Fred Herrmann (P49519)
Matthew L. Powell (P69186)
KERR, RUSSELL AND WEBER, PLC
500 Woodward Avenue, Suite 2500
Detroit, MI 48226
(313) 961-0200
(313) 961-0388 (facsimile)
jswanson@kerr-russell.com
fherrmann@kerr-russell.com
mpowell@kerr-russell.com

Attorneys for Defendants Fujikura Ltd. and Fujikura Automotive America LLC

### O'MELVENY & MYERS LLP

By: /s/Michael F. Tubach (w/consent)

Michael F. Tubach

O'MELVENY & MYERS LLP

Two Embarcadero Center, 28th Floor

San Francisco, CA 94111

Telephone: (415) 984-8700

Fax: (415) 984-8701 Mtubach@omm.com

Michael R. Turco (P48705)

**BROOKS WILKINS SHARKEY & TURCO** 

PLLC

401 South Old Woodward, Suite 400

Birmingham, MI 48009

Telephone: (248) 971-1713

Fax: (248) 971-1801

turco@bwst-law.com

Attorneys for Defendants Leoni Wiring Systems,

Inc. and Leonische Holding Inc.

### **BUTZEL LONG**

By: /s/David F. DuMouchel (w/consent)

David F. DuMouchel (P25658)

George B. Donnini (P66793)

**BUTZEL LONG** 

150 West Jefferson, Suite 100

Detroit, MI 48226

Telephone: (313)225-7000

dumouchd@butzel.com

donnini@butzel.com

W. Todd Miller

**BAKER & MILLER PLLC** 

2401 Pennsylvania Ave., NW, Suite 300

Washington, DC 20037

Telephone: (202)663-7820

TMiller@bakerandmiller.com

Attorneys for Defendants Tokai Rika Co., Ltd.

and TRAM, Inc.

## PORTER WRIGHT MORRIS & ARTHUR LLP

### By: /s/ Donald M. Barnes (w/consent)

Donald M. Barnes
Jay L. Levine
John C. Monica
Molly S. Crabtree
Jason E. Starling
DONTED WRIGHT M.

### PORTER WRIGHT MORRIS & ARTHUR

LLP

1919 Pennsylvania Ave., NW, Ste 500

Washington, DC 20006 Telephone: (202) 778-3054 Facsimile: (202) 778-3063 dbarnes@porterwright.com jmonica@porterwright.com mcrabtree@porterwright.com jstarling@porterwright.com

Attorneys for Defendants G.S. Electech, Inc., G.S.W. Manufacturing, Inc., and G.S. Wiring Systems, Inc.

### JENNER & BLOCK LLP

## By: /<u>s/ Terrence J. Truax</u>

Terrence J. Truax
Charles B. Sklarsky
Michael T. Brody
Gabriel A. Fuentes
Daniel T. Fenske
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654-3456
ttruax@jenner.com
csklarsky@jenner.com
mbrody@jenner.com
gfuentes@jenner.com
dfenske@jenner.com

Gary K. August Jamie J. Janisch ZAUSMER, AUGUST & CALDWELL, P.C. 31700 Middlebelt Road, Suite 150 Farmington Hills, MI 48334-2374 gaugust@zacfirm.com jjanisch@zacfirm.com Attorneys for Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., and Mitsubishi Electric Automotive America, Inc.

### **K&L GATES LLP**

By: <u>/s/ Michael E. Martinez</u>

Steven M. Kowal

Lauren N. Norris

Lauren B. Salins

**K&L GATES LLP** 

70 W. Madison St.

Suite 3100

Chicago, IL 60602

Telephone: (312) 807-4404

Fax: (312) 827-8116

michael.martinez@klgates.com

steven.kowal@klgates.com

lauren.norris@klgates.com

lauren.salins@klgates.com

William P. Jansen (P36688)

Michael G. Brady (P57331)

Amanda Fielder (P70180)

WARNER NORCROSS & JUDD LLP

2000 Town Center, Suite 2700

Southfield, MI 48075-1318

Telephone: (248) 784-5000

wjansen@wnj.com

mbrady@wnj.com

afielder@wnj.com

Attorneys for Defendants Chiyoda Manufacturing Corporation and Chiyoda USA Corporation

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2015, I caused the foregoing NOTICE OF OBJECTIONS TO END PAYOR PLAINTIFF AND AUTO DEALER PLAINTIFF DEPOSITION PROTOCOL ORDER to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Marguerite M. Sullivan
Marguerite M. Sullivan
LATHAM & WATKINS LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
+1.202.637.2200
maggy.sullivan@lw.com